

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MICHAEL HALLMARK on behalf of
himself and all others similarly situated,

No. 11-CV-842(WMS)(LGF)

Plaintiff,

vs.

CLASS ACTION

COHEN & SLAMOWITZ, LLP
MIDLAND FUNDING LLC d/b/a
MIDLAND FUNDING OF DELAWARE LLC,

Defendants.

Notice of Motion to Compel

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Michael N. Litrownik and Memorandum of Law and upon all of the other papers and proceedings had herein, Plaintiff will move this Court, under Rule 37(a) of the Federal Rules of Civil Procedure, for an order compelling Defendant Cohen & Slamowitz, LLP to supplement its responses to Plaintiff's First Set of Interrogatories and to produce responsive documents, together with such other and further relief as the Court may deem just and equitable. Specifically, Plaintiff moves to compel supplemental responses to Interrogatory nos. 10, 11, 15, 16, and 19-24 and moves to compel the production of document responsive to Requests for Production nos. 1, 2, 6, 8, 9, 11, 12, 15, 18-24, and 26-49.

Dated: New York, New York
April 12, 2013

/s/ Michael N. Litrownik
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